

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

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CLERK'S OFFICE
U.S. DISTRICT COURT
SAN JUAN, P.R.

GLORIA GARCIA, ET ALS

Plaintiff,

V.

FRITO LAY SNACKS CARIBBEAN,
INC., ET ALS

Defendants

CIVIL NO. 97-1313 (SEC)

PLAINTIFF REQUEST FOR TRIAL BY
JURY

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U.S. DISTRICT COURT
SAN JUAN, P.R.

CONSENT PROTECTIVE ORDER

This lawsuit is presently in discovery, and it appears that such discovery may involve review of confidential files including personnel, security, and other business records and information that are confidential and proprietary. Defendant is willing to allow plaintiff's counsel to review, copy, and use documents defendant considers to be confidential and/or proprietary with an appropriate protective order in place. Accordingly, good cause having been shown within the meaning of Rule 26(c), Fed. R. Civ. P., and it appearing that the parties consent to entry of this Protective Order, IT IS HEREBY ORDERED THAT:

(1) All documents and information produced herein which are designated by the parties as "confidential" (pursuant to the listing attached hereto as Exhibit A) by stamping those documents "CONFIDENTIAL" shall be treated as such by all parties to this litigation. Such confidential documents and information, and all copies, summaries, compilations, notes or abstracts thereof, shall be used exclusively in this action. Upon conclusion of this action, all

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Munoz

(Signature)

copies of confidential records shall be returned to defendant and all notes, abstracts or summaries of confidential documents and information shall be destroyed by counsel.

(2) Any document or other material, including depositions, designated as confidential under this Order shall, when filed with the Court, be clearly marked "confidential," sealed, and placed in separate, secure storage by the Clerk. Such documents may be opened and reviewed only by authorized Court personnel or upon request, by counsel of record, after written or oral notice to opposing counsel.

(3) Documents and other material designated as confidential pursuant to the terms of this Order may only be disclosed to the parties; to those prospective parties and witnesses who have a bona fide need to review the contents of the documents to aid in the preparation of this case for trial; and to trial counsel, and/or employees or professional assistants (including independent consultants) of trial counsel.

(4) Persons listed in paragraph 3 above, other than trial counsel and the named individual parties, shall not be afforded access to confidential information unless they first agree, by signing a statement identical to Exhibit "B" hereto, to be bound by the letter and the spirit of this order and not to disclose the confidential information to anyone other than trial counsel for the parties, except as required by lawful judicial process. Such statements shall be retained by counsel for the parties.

(5) This order shall not prevent counsel from using any documents and other material obtained and designated as confidential hereunder in this action in motions, affidavits or other pleadings or in open court, so long as such documents or pleadings containing summaries of such documents are treated as confidential pursuant to the provisions of this order.

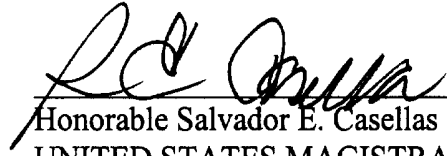


(6) Neither the taking of nor the failure to take any action to enforce the provisions of this Protective Order, nor the failure to object to any such action or omission shall constitute a waiver of any claim or defense in the trial of this action.


(7) This Protective Order shall govern all pretrial proceedings, but shall be subject to modification upon application of a party to this lawsuit and for good cause shown.

IT IS ORDERED.

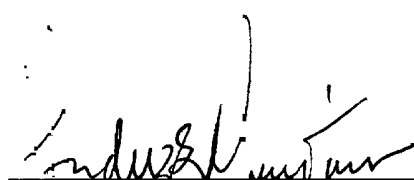
This 5 day of November, 1999.


Honorable Salvador E. Casellas
UNITED STATES MAGISTRATE JUDGE

CONSENTED TO:


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Attorney For Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

GLORIA GARCIA, ET ALS

Plaintiff,

V.

**FRITO LAY SNACKS CARIBBEAN,
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Defendants

[illegible]

CIVIL NO. 97-1313 (SEC)

PLAINTIFF REQUEST TRIAL BY JURY

EXHIBIT A

LIST OF CONFIDENTIAL DOCUMENTS AND INFORMATION

1. Puerto Rico Action Plan dated October 2, 1995.
2. Revised Puerto Rico Action Plan, dated January 3, 1996.
3. Revised Puerto Rico Action Plan, dated March 11, 1996.
4. Organizational levels (with initials NRD)
5. Salary structure (with initials NRD)
6. Compensation survey 1998 by William M. Mercer Companies, Inc.

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GLORIA GARCIA, ET ALS

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Defendants

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CIVIL NO. 97-1313 (SEC)

PLAINTIFF REQUEST TRIAL BY JURY

EXHIBIT B

STATEMENT OF CONFIDENTIALITY

By signing this document, I hereby certify that I have read the Consent Protective Order entered by the Court in *Gloria García Vázquez, et als. v. Frito Lay Snacks Caribbean, et als.*, Civil Action File No. 97-1313 (SEC) on _____. I understand that Order and agree to abide by its contents by not disclosing confidential information to anyone other than trial counsel for the parties, except as required by lawful judicial process.

Name

Date _____